

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	Case No. 3:21-cv-00923
Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
Defendants.)	

DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Defendants, The Lampo Group, LLC (“Lampo”) and Dave Ramsey (“Ramsey”), by and through undersigned counsel and pursuant to Rule 30(d)(3) of the Federal Rules of Civil Procedure and the Court’s Order dated June 23, 2023 (Doc. #105), move the Court for a protective order prohibiting Plaintiff, Brad Amos, from seeking deposition testimony from Ramsey related to *Caitlin O’Connor v. The Lampo Group, LLC*, Case No. 3:20-cv-00628, currently pending in the U.S. District Court for the Middle District of Tennessee (the “Pending Litigation”).

As more fully explained in Defendants’ concurrently filed memorandum of law (Doc. #107), the Pending Litigation has no relevance to this case and Plaintiff is seeking deposition testimony about it from Ramsey in a bad faith attempt to annoy, embarrass, and oppress Defendants.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on June 23, 2023, I filed the foregoing *Defendants' Motion for Protective Order* via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

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